

# EXHIBIT B

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**From:** Bender, Kristin <KBender@willkie.com>  
**Sent:** Wednesday, July 2, 2025 8:15 PM  
**To:** Pohlman, Daniel J.; Breed, Maxwell; Connolly, Michaela; Taustine, Melissa; Adams-Jack, Autumn; Roeser, Stephanie  
**Cc:** Enkeshafi, Parmida  
**Subject:** RE: Case/Koslow Subpoenas - Lighthouse

Thanks for the update, Dan.

We are amenable to a reasonable extension to account for the good-faith progress to date. Given that Ms. Lively's deposition is set for July 17, we propose July 14 (i.e., a week extension) so that we will have the minimum time necessary to process and review the productions at a high level before that deposition. Let us know if that works.

We will circle back on the proposed terms (thank you) asap tomorrow, which I understand is when processing may be completed such that search terms can then be run.

Best,  
KB

Kristin Bender  
**Willkie Farr & Gallagher LLP**  
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**From:** Pohlman, Daniel J. <dpohlman@pryorcashman.com>  
**Sent:** Wednesday, July 2, 2025 2:21 PM  
**To:** Bender, Kristin <KBender@willkie.com>; Breed, Maxwell <MBreed@pryorcashman.com>; Connolly, Michaela <MConnolly@willkie.com>; Taustine, Melissa <MTaustine@willkie.com>; Adams-Jack, Autumn <AAdams-Jack@willkie.com>; Roeser, Stephanie <SROeser@manatt.com>  
**Cc:** Enkeshafi, Parmida <PEnkeshafi@pryorcashman.com>  
**Subject:** RE: Case/Koslow Subpoenas - Lighthouse

**\*\*\* EXTERNAL EMAIL \*\*\***

Kristin,

As an update following your suggestion to connect post-collection, as of yesterday, on-premises collections for both custodians were completed.

We spoke with the team at Lighthouse, and they do not expect processing to be complete until tomorrow at earliest.

Given the upcoming holiday weekend, and the fact that the parties have not yet discussed search terms, a production deadline of July 7 is no longer feasible despite our good faith efforts. Accordingly, we request a reasonable extension. We believe Wednesday, July 16 is appropriate. Please let us know if you disagree. To the extent we cannot agree on a mutual extension, we will request relief from the Court.

In an effort to move this process forward promptly and in good faith, we have prepared a list of proposed search terms for your review. We will provide search term hit information when it is available to us.

- Blake
- Lively
- Ryan
- Reynolds
- Justin
- Baldoni
- “It Ends With Us”
- IEWU
- “Betty Buzz”
- “Blake Brown”
- Aviation
- “Mint Mobile”
- “Maximum Effort Productions”
- Wayfarer
- Sarowitz

Best,  
Dan

—  
Daniel J. Pohlman / PRYOR CASHMAN LLP / 212.326.0823

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**From:** Bender, Kristin <[KBender@willkie.com](mailto:KBender@willkie.com)>  
**Sent:** Friday, June 27, 2025 4:07 PM  
**To:** Pohlman, Daniel J. <[dpohlman@pryorcashman.com](mailto:dpohlman@pryorcashman.com)>; Breed, Maxwell <[MBreed@pryorcashman.com](mailto:MBreed@pryorcashman.com)>; Connolly, Michaela <[MConnolly@willkie.com](mailto:MConnolly@willkie.com)>; Taustine, Melissa <[MTaustine@willkie.com](mailto:MTaustine@willkie.com)>; Adams-Jack, Autumn <[AAdams-Jack@willkie.com](mailto:AAdams-Jack@willkie.com)>; Roeser, Stephanie <[SROeser@manatt.com](mailto:SROeser@manatt.com)>  
**Cc:** Enkeshafi, Parmida <[PEnkeshafi@pryorcashman.com](mailto:PEnkeshafi@pryorcashman.com)>  
**Subject:** RE: Case/Koslow Subpoenas - Lighthouse

Hi Dan,

Thank you for the update, we appreciate it. I understand that on-site collection is necessary, and that based on your clients' availability the collections will take place next week. The vendor also indicated that they can conduct on-site collections over the weekend if that aligns with availability for your clients.

We understand that you are working in good faith to meet the deadline, and we will likewise work with you in good faith and in light of any challenges posed with processing time, the July 4 holiday, etc. I propose we touch base after collections, once you all have a perspective on volume, review, etc., and we can determine what the timeline (with any necessary extension) looks like. We also welcome any continued updates and I am around today or tomorrow if you would like to discuss anything.

Thanks,  
Kristin

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**From:** Pohlman, Daniel J. <[dpohlman@pryorcashman.com](mailto:dpohlman@pryorcashman.com)>

**Sent:** Friday, June 27, 2025 2:25 PM

**To:** Bender, Kristin <[KBender@willkie.com](mailto:KBender@willkie.com)>; Breed, Maxwell <[MBreed@pryorcashman.com](mailto:MBreed@pryorcashman.com)>; Connolly, Michaela <[MConnolly@willkie.com](mailto:MConnolly@willkie.com)>; Taustine, Melissa <[MTaustine@willkie.com](mailto:MTaustine@willkie.com)>; Adams-Jack, Autumn <[AAdams-Jack@willkie.com](mailto:AAdams-Jack@willkie.com)>; Roeser, Stephanie <[SROeser@manatt.com](mailto:SROeser@manatt.com)>

**Cc:** Enkeshafi, Parmida <[PEnkeshafi@pryorcashman.com](mailto:PEnkeshafi@pryorcashman.com)>

**Subject:** RE: Case/Koslow Subpoenas - Lighthouse

**\*\*\* EXTERNAL EMAIL \*\*\***

Kristin,

Following up on the below and to keep you apprised – Willkie’s request for on-premises collections (so as to collect metadata from any potentially deleted messages) is now contributing to additional delays, notwithstanding the continued efforts of both our clients and your vendor. As such, we still have yet to complete our collections.

We note this in hope that, as discussed below, should the need arise for an extension (which now seems probable, due to processing time alone) that you will work with us in good faith. We are, to the extent it helps, glad to discuss mutually agreeable solutions to help mitigate any issues, including rolling productions of documents.

Alternatively, to the extent that you are willing to drop your request for an on-premises collection, we could proceed remotely, which may provide us with a more workable schedule.

Please let us know if you would like to confer regarding any of the above. We will keep you apprised as this continues to develop.

Best,  
 Dan

—  
 Daniel J. Pohlman / PRYOR CASHMAN LLP / 212.326.0823

**From:** Bender, Kristin <[KBender@willkie.com](mailto:KBender@willkie.com)>

**Sent:** Thursday, June 26, 2025 11:37 AM

**To:** Breed, Maxwell <[MBreed@pryorcashman.com](mailto:MBreed@pryorcashman.com)>; Pohlman, Daniel J. <[dpohlman@pryorcashman.com](mailto:dpohlman@pryorcashman.com)>; Connolly, Michaela <[MConnolly@willkie.com](mailto:MConnolly@willkie.com)>; Taustine, Melissa <[MTaustine@willkie.com](mailto:MTaustine@willkie.com)>; Adams-Jack, Autumn <[AAdams-Jack@willkie.com](mailto:AAdams-Jack@willkie.com)>; Roeser, Stephanie <[SROeser@manatt.com](mailto:SROeser@manatt.com)>

**Cc:** Enkeshafi, Parmida <[PEnkeshafi@pryorcashman.com](mailto:PEnkeshafi@pryorcashman.com)>

**Subject:** Re: Case/Koslow Subpoenas - Lighthouse

Thanks, Max. We will certainly do our best to work with you.

—  
 On June 26, 2025 at 11:20:52 AM EDT, Breed, Maxwell <[MBreed@pryorcashman.com](mailto:MBreed@pryorcashman.com)> wrote:

**\*\*\* EXTERNAL EMAIL \*\*\***

Thank you, Kristin. Pardon the direct tone, but we are reliant on your team to provide us a collection and hosting vendor so that we can comply with the ordered deadline. We’ve yet, two days after the hearing, to be

put into a position where we can collect data to review. If the data set proves to be too large to review in the time that you leave us, we trust that you'll work with us to alleviate the burdens to which your timing has subjected us. We'll, of course, involve the court as needed.

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**MAXWELL BREED**

Partner

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**From:** Bender, Kristin <[KBender@willkie.com](mailto:KBender@willkie.com)>

**Sent:** Thursday, June 26, 2025 11:14 AM

**To:** Breed, Maxwell <[MBreed@pryorcashman.com](mailto:MBreed@pryorcashman.com)>; Pohlman, Daniel J. <[dpohlman@pryorcashman.com](mailto:dpohlman@pryorcashman.com)>; Connolly, Michaela <[MConnolly@willkie.com](mailto:MConnolly@willkie.com)>; Taustine, Melissa <[MTaustine@willkie.com](mailto:MTaustine@willkie.com)>; Adams-Jack, Autumn <[AAdams-Jack@willkie.com](mailto:AAdams-Jack@willkie.com)>; Roeser, Stephanie <[SROeser@manatt.com](mailto:SROeser@manatt.com)>

**Cc:** Enkeshafi, Parmida <[PEnkeshafi@pryorcashman.com](mailto:PEnkeshafi@pryorcashman.com)>

**Subject:** Re: Case/Koslow Subpoenas - Lighthouse

Hi Max,

As Michaela explained to you, you were connected with Lighthouse as soon as was feasible and we are not interacting with your independent project managers and team. However, we have emphasized and made clear the necessarily expeditious nature of this project. I presume you are in contact with your dedicated team and can do the same. If you wish to discuss intractable issues with timing, that would be appropriate only once those issue arise. I do not take your emails to be representing that July 7 is no longer feasible, nor does that premature assessment seem correct. We do not appreciate your demands or your tone, nor are we in a position to revise the Court's order at this point. I can assure you that we want these documents as soon as possible. If there is something you think we can do to assist you, please let us know and we will do our earnest best.

Regards,  
 Kristin

On June 26, 2025 at 10:59:34 AM EDT, Breed, Maxwell <[MBreed@pryorcashman.com](mailto:MBreed@pryorcashman.com)> wrote:

**\*\*\* EXTERNAL EMAIL \*\*\***

Now we're up to two additional days that we'll need as a result of plaintiff-side delay. We can't review or produce what we can't collect.

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**From:** Breed, Maxwell  
**Sent:** Wednesday, June 25, 2025 3:10 PM  
**To:** Pohlman, Daniel J. <[dpohlman@pryorcashman.com](mailto:dpohlman@pryorcashman.com)>; Connolly, Michaela <[MConnolly@willkie.com](mailto:MConnolly@willkie.com)>; Bender, Kristin <[KBender@willkie.com](mailto:KBender@willkie.com)>; Taustine, Melissa <[MTaustine@willkie.com](mailto:MTaustine@willkie.com)>; Adams-Jack, Autumn <[AAdams-Jack@willkie.com](mailto:AAdams-Jack@willkie.com)>  
**Cc:** Enkeshafi, Parmida <[penkeshafi@pryorcashman.com](mailto:penkeshafi@pryorcashman.com)>  
**Subject:** RE: Case/Koslow Subpoenas - Lighthouse

We trust that you will agree to extend our production deadline by one day for every day you delay our collection. The total is now one. Thank you.

**MAXWELL BREED**  
 Partner  
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**From:** Pohlman, Daniel J. <[dpohlman@pryorcashman.com](mailto:dpohlman@pryorcashman.com)>  
**Sent:** Wednesday, June 25, 2025 3:08 PM  
**To:** Connolly, Michaela <[MConnolly@willkie.com](mailto:MConnolly@willkie.com)>; Bender, Kristin <[KBender@willkie.com](mailto:KBender@willkie.com)>; Taustine, Melissa <[MTaustine@willkie.com](mailto:MTaustine@willkie.com)>; Adams-Jack, Autumn <[AAdams-Jack@willkie.com](mailto:AAdams-Jack@willkie.com)>

**Cc:** Enkeshafi, Parmida <[PEnkeshafi@pryorcashman.com](mailto:PEnkeshafi@pryorcashman.com)>; Breed, Maxwell

<[MBreed@pryorcashman.com](mailto:MBreed@pryorcashman.com)>

**Subject:** RE: Case/Koslow Subpoenas - Lighthouse

All, we still have not received a response on this.

—  
Daniel J. Pohlman / PRYOR CASHMAN LLP / 212.326.0823

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**From:** Connolly, Michaela <[MConnolly@willkie.com](mailto:MConnolly@willkie.com)>

**Sent:** Tuesday, June 24, 2025 6:24 PM

**To:** Pohlman, Daniel J. <[dpolman@pryorcashman.com](mailto:dpolman@pryorcashman.com)>; Bender, Kristin <[KBender@willkie.com](mailto:KBender@willkie.com)>;

Taustine, Melissa <[MTaustine@willkie.com](mailto:MTaustine@willkie.com)>; Adams-Jack, Autumn <[AAdams-Jack@willkie.com](mailto:AAdams-Jack@willkie.com)>

**Cc:** Enkeshafi, Parmida <[PEnkeshafi@pryorcashman.com](mailto:PEnkeshafi@pryorcashman.com)>

**Subject:** RE: Case/Koslow Subpoenas - Lighthouse

Hi Dan,

We are identifying the appropriate point of contact at our vendor (Lighthouse) and will circle back early tomorrow.

Best,  
Michaela

**Michaela Connolly**

**Willkie Farr & Gallagher LLP**

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Pronouns: she, her, hers

---

**From:** Pohlman, Daniel J. <[dpolman@pryorcashman.com](mailto:dpolman@pryorcashman.com)>

**Sent:** Tuesday, June 24, 2025 5:02 PM

**To:** Bender, Kristin <[KBender@willkie.com](mailto:KBender@willkie.com)>; Taustine, Melissa <[MTaustine@willkie.com](mailto:MTaustine@willkie.com)>; Adams-Jack,

Autumn <[AAdams-Jack@willkie.com](mailto:AAdams-Jack@willkie.com)>; Connolly, Michaela <[MConnolly@willkie.com](mailto:MConnolly@willkie.com)>

**Cc:** Enkeshafi, Parmida <[PEnkeshafi@pryorcashman.com](mailto:PEnkeshafi@pryorcashman.com)>

**Subject:** Case/Koslow Subpoenas - Lighthouse

||| \*\*\* EXTERNAL EMAIL \*\*\*

Hi all,

Could you please put us in contact with your vendor so we can arrange for collection?

Thank you!

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